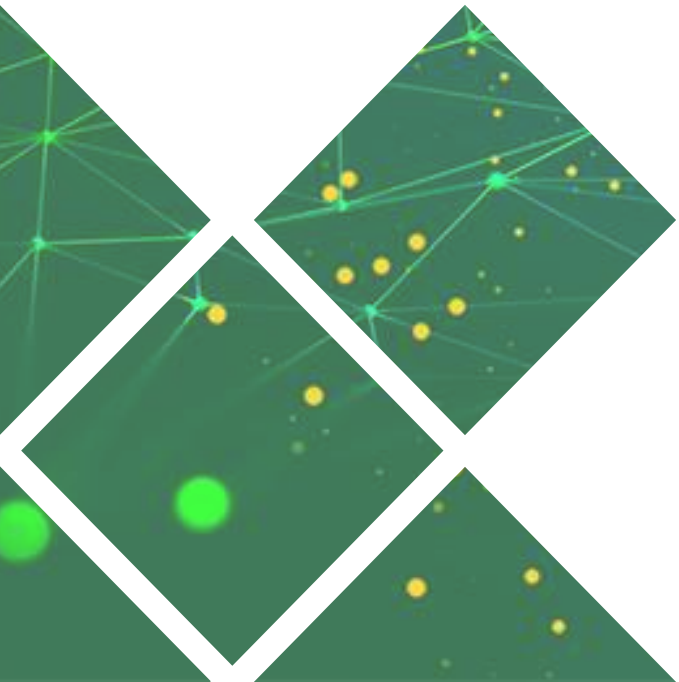


Change Board Meeting 91

26 June 2024



Competition Act Compliance

It is everyone's responsibility to say something

The Chair will move the conversation on



■ Change Board Terms of Reference

- The Change Board is the delegated Sub-Committee of Panel for voting on Modifications. The Change Board has power to:
 - consider each Modification Report and the Modification Report Consultation responses presented at the end of the Modifications Process. It will agree **whether the Modification Report is ready to be voted upon**, and if not **what further analysis or clarifications are required** before the Modification Report can be voted upon;
 - **perform the final vote** on approval or rejection of a Modification Proposal. For a Self-Governance Modification, the Change Board's vote shall form a decision, which is then subject to a 10 Working Day period in which Parties can refer this outcome to the SEC Panel before becoming final. For any other Modification Proposal, this vote shall form a recommendation to the Authority, who will make the final decision; and
 - **determine if the DCC Impact Assessment should be performed**, with the costs of that incurred by Parties. Where the Change Board believes this is not the case, it will need to state **what further work is required** before it will agree to request the DCC Impact Assessment.

■ Agenda

1. Approval of previous meeting minutes
2. Actions outstanding
3. Change Board votes
4. SEC Modifications Timetables update
5. AOB

Agenda Item 1

Approval of previous
meeting minutes
Rachel Black (SECAS)

■ Recommendations

- No comments received
- **APPROVE** these minutes as final

Agenda Item 2

Actions outstanding
Rachel Black (SECAS)

■ Actions Outstanding

Ref	Action	Owner	Update	Status
71/01	The DCC to provide a view on the share of the MP162 costs.	DCC	The DCC are currently in discussions with service providers to determine what the Pre-Integration Testing (PIT) costs will be.	Open

Agenda Item 3

Change Board Votes

■ MP246 'DCC User access to metadata via the DCC Self-Service Interface (SSI)'

Khaleda Hussain

Raised by James Burney from SSE Energy Supply Ltd on behalf of SEC Panel

Self-Governance

MEDIUM

The MP246 slides are classified as 'GREEN', please email sec.change@gemserv.com if you would like to access them.

■ MP230 'Review the SLA for delivery and completion for SMETS1 firmware'

Mohammedanwar Sumro

Raised by Nick Rodgers from the DCC
Self-Governance

HIGH

■ MP230: Overview

- The DCC Systems have a limit to the amount of large SMETS1 firmware images that can be processed
- Firmware images larger than 750kB need to be broken down into multiple images for transmission between the S1SP and DCO
- Current SLA cannot be achieved for firmware images bigger than 750kB

Issue



- Potential decline in System performance
- If DCC fails to meet System performance, Ofgem may determine a reduction in the baseline margin that DCC may retain for the Regulatory Year

Impact



- SEC Appendix E 'DCC User Interface Services Schedule' (UISS)
- DCC Users to contact the DCC Service Desk to coordinate and agree on a delivery schedule where a batch is larger than 500 images per day and when a firmware image is larger than 750kB.
- DCC will meet the SLA on the agreed delivery schedule.

Proposed Solution



■ MP230: Key points

Infrastructure upgrade

- Significant investment in DCC System infrastructure is required for an event that is infrequent
- Least cost-effective approach

Firmware Threshold limits

- The TABASC supported the threshold of 750kB
- DCC believe that the batch size limit of 500 images is suitable when containing 750kB firmware images to ensure multiple Suppliers can be managed simultaneously

Emergency related firmware updates

- Dealt with separately to larger firmware updates
- Managed on a case by case basis depending on the severity and specifics of the incident

Business Case

- The DCC can manage the updating of a small number of larger firmware images for SMETS1, which would normally be an issue if released onto the DCC System in large volumes

■ MP230: Forum views

Working Group

Supports the modification

Recommended legal text review to ensure intended purpose is delivered

Concerns of how Parties would be prioritised

TABASC

Supportive of the modification

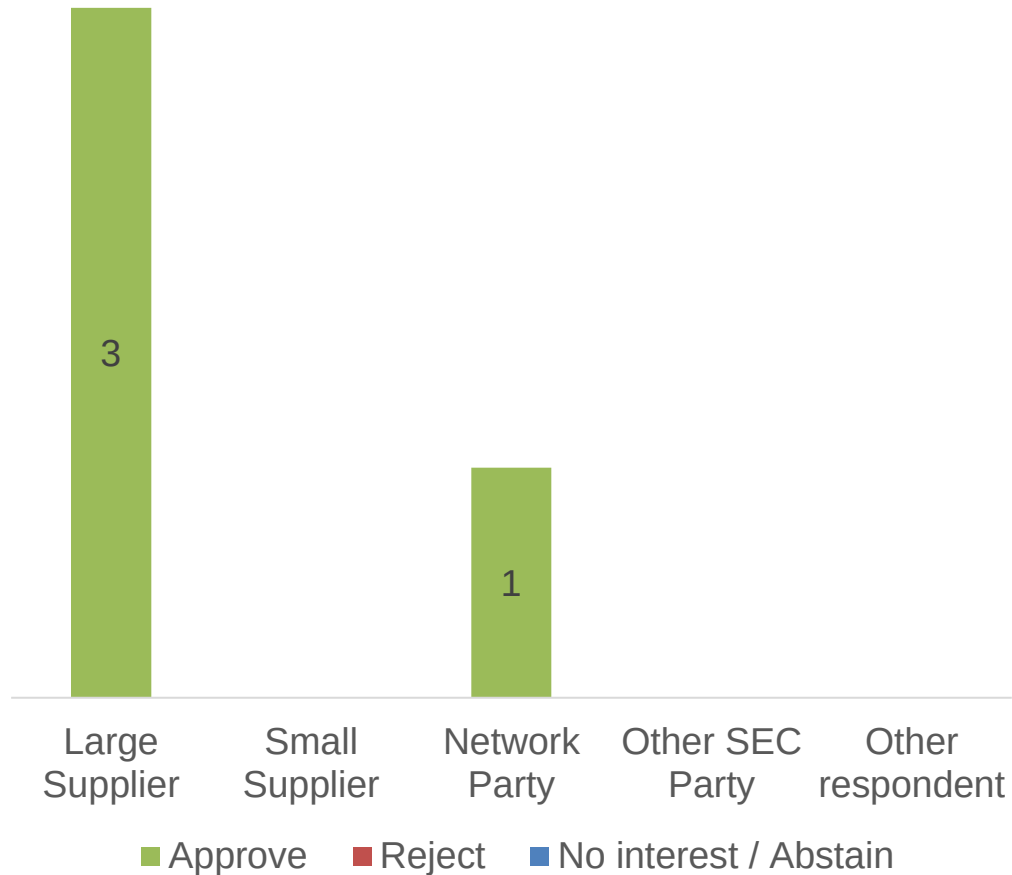
Agreed on the threshold of any batch size quantity and image size applicable

SSC

Supports the modification

Agreed that Emergency related firmware updates are treated separately from the solution in this modification

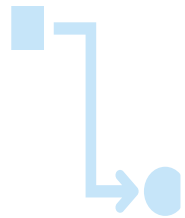
■ MP230: MRC Responses



Key comments

- All respondents believe the modification supports General SEC Objective B
- One respondent believes the modification supports General SEC Objective A – G
- MP230 is a formalisation of the actions being taken by Suppliers when dealing with large SMETS1 firmware data packets.
- Solution would solve the issue, but it does not cure the underlying problem with infrastructure demands of large SMETS1 upgrades

■ MP230: Assessment of Change



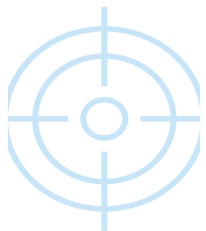
Impacted Parties

- Suppliers
- DCC



Costs

- SECAS implementation costs



Target Release

- Nov 2024 SEC Release



Benefits

- Less risk of System degradation
- Clarity by formalising process rather than expensive system improvement

SEC Objective (b)

(b) Enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence

■ MP230: Recommendations

- **DETERMINE** whether this Modification Proposal should proceed to vote
- **DETERMINE** whether this Modification Proposal should be **APPROVED** or **REJECTED** under Self-Governance
- **PROVIDE** rationale for this decision against the General SEC Objectives

SEC Objective (b)

(b) Enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence

■ MP224 'SEC Performance Assurance Framework'

Kev Duddy

Raised by Emslie Law from OVO Energy

Authority Determined

HIGH

Overview

- SEC does not explicitly define a Performance Assurance Framework (PAF)
- Panel is expected to manage any performance-related matters as they arise

Issue



- Panel's scope is broad and managing matters case-by-case is challenging
- Project identified some issues and instances that may have fallen under scope of a PAF

Impact

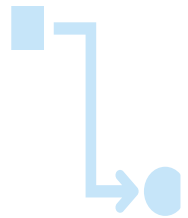


- New SEC Appendix 'Performance Assurance Framework'
- Changes to Section C 'Governance'
- New Performance Assurance Board to be created to manage the framework

Proposed Solution



■ Assessment of Change



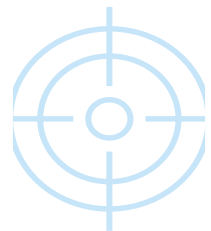
Impacted Parties

- All SEC Parties



Costs

- £185k included within budget



Target Release

- Ad hoc SEC Release (one day after decision)



Benefits

- As per next slide

SEC Objective (a) and (g)

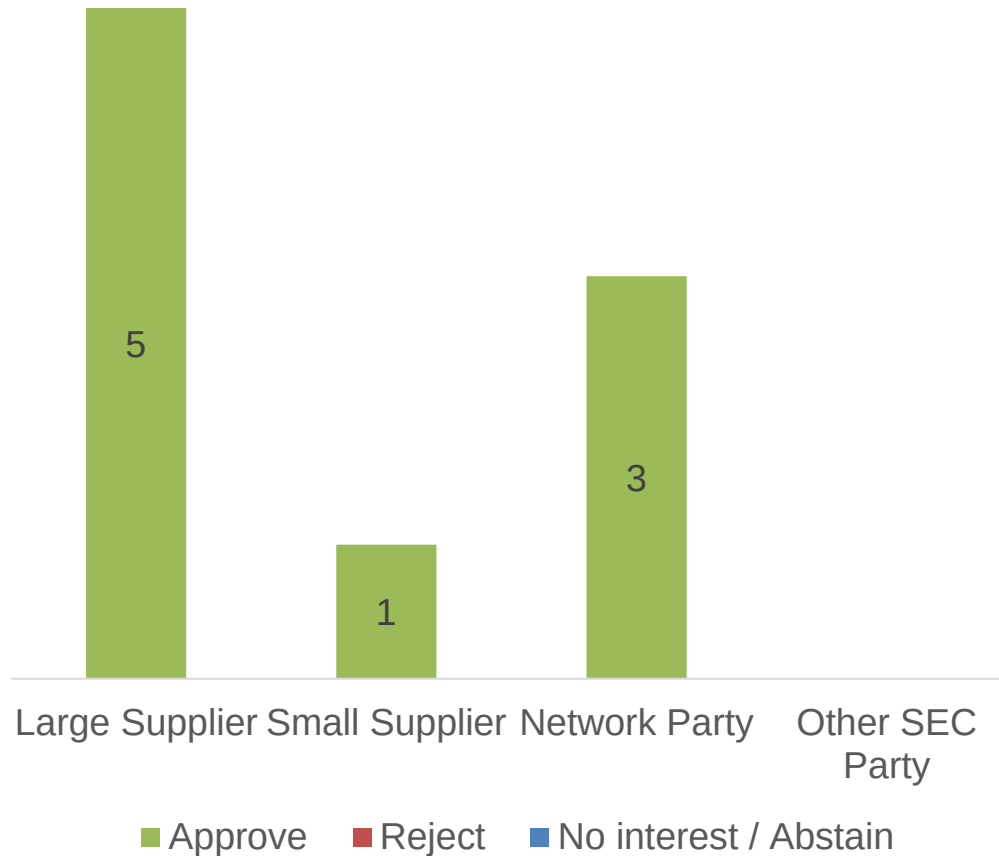
- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
- (g) facilitate the efficient and transparent administration and implementation of this Code.

Benefits

Noted risk by RFI respondent	Potential consumer or financial impact	Potential risk score	Potential Mitigation target
Failure to complete post-commissioning or SMKI obligations	100-250k consumers	3x5 = 15	25k-100k
DCC Outages	100-250k consumers	3x5 = 15	25k-100k
MHHS and increased DCC traffic	100-250k consumers	3x5 = 15	25k-100k
Suppliers not responding to install code emails	100-250k consumers £5m pa in Device exchange, resource to investigate	4x5=20	25k-100k
Suppliers not keeping firmware up to date	500k consumers	5x5=25	100k-250k
Suppliers not updating the SMI	100-250k consumers 500k money spent on resource to fix	3x5 = 15	25k-100k

A risk-based PAF would identify the areas of greatest risk to the achievement of the SEC Objectives and then make sure that appropriate performance assurance techniques were in place to manage those risks.

MRC Responses



Key comments

- Detail of the PAF to be delivered post implementation
- Final documentation should be subject to Party approval
- Amnesty period should be introduced before penalties levied
- Members of the PAB should be different to Panel
- Some challenge over examples provided in the Modification Report

■ Forum views

Working Group

Supports the
modification

Differences of
opinion on scope

OPSG

Supports the
modification

■ MP224: Recommendations

- **DETERMINE** whether this Modification Proposal should proceed to vote
- **RECOMMEND** to the Authority whether this Modification Proposal should be **APPROVED** or **REJECTED**
- **PROVIDE** rationale for this recommendation against the General SEC Objectives

SEC Objective (a) and (g)

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
- (g) facilitate the efficient and transparent administration and implementation of this Code.

■ MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'

Liz Woods

Raised by Ian Turner from E.ON
Self-Governance

MEDIUM

Overview

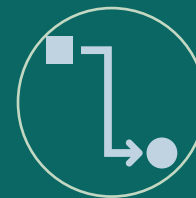
- As part of Post Commissioning Obligations, Suppliers & WAN Providers are expected to update Device Certificates.
 - Within 7 days following installation, via SR 6.17 'Issue Security Credentials' and SRV 6.15.2 'Update Security Credentials (Device)'.
- Some instances, success response not processed/received by the DSP
- Results in Certificate misalignment between Device and DSP.

Issue



- Parties are unable to communicate with any Device that has a Certificate that is misaligned with the DSP Master Key Store.
- Manual correction has associated costs and is prone to errors.
- 120k known misalignments in March 2023, manually resolved 76k, a large number of corrections pending submission to DCC.
- Device Certificate misalignment causes all SRs to fail on a Device, except for SRV 6.24.2 'Retrieve Device Security Credentials (Device)'.

Impact

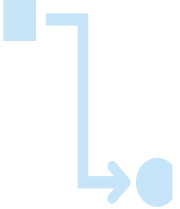


- To allow Suppliers to identify the correct Device Certificates.
- Update any misaligned Certificates on Devices via the Self-Service Interface (SSI) or Self-Service Management Interface (SSMI).

Proposed Solution

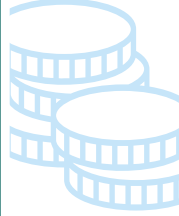


Assessment of Change



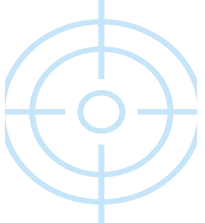
Impacted Parties

- Suppliers
- DCC



Costs

- £339,178 in Design, Build & PIT
- £165,364 in Implementation, including integration testing & deployment
 - *Application support for 3 months*



Target Release

- Phase 1 – Interim solution in November 2024 DCC Maintenance Release
- Phase 2 – Enduring solution in June 2025 SEC Release



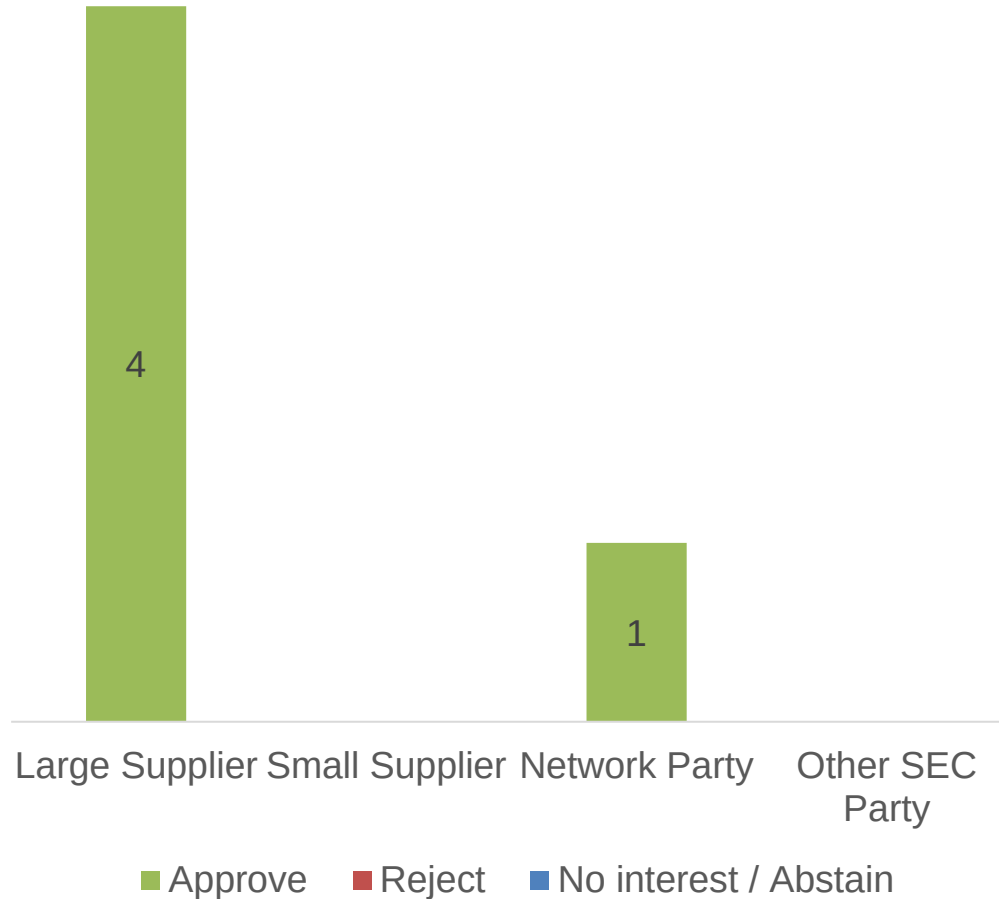
Benefits

- Resolve costly manual correction process - Design, Built & PIT cost is less than manually processing the current outstanding corrections
- Reduced issues with PPMIDs
- Functional SMETS Device after CoS

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

MRC Responses 1/2



Key comments

- All 5 respondents approve.
 - Agreed it would better facilitate General SEC Objective (a).
- Keen to see this change approved and implemented as soon as possible.
- Will ultimately improve the Smart Meter estate communications and add to the benefits for customers and ourselves.

■ MRC Responses 2/2

Respondent comment

Do the preliminary changes (for November 2024 Maintenance release) require any Regression Testing? If so, presumably these will also be delayed, if SECMP0028 is deferred to June 2025.



SECAS response

MP239 (once approved) will be included in the November 2024 DCC maintenance release, which is not linked to a SEC Release or SECMP0028.

The DCC stressed that a DCC maintenance release is a separate release and not part of SEC Release costings.

Working Group

Supports the
modification

Benefits justify the cost

SMKI PMA

Supports the
modification

Considered the issue
could be described as a
defect

DCC noted Design, Built & PIT cost is less than processing manual corrections

■ Legal text amendments – Appendix AD 1/2

3.8.68 Update Security Credentials (Device)

3.8.68.4 *Additional DCC System Processing*

When the DCC receives a Response indicating Success from an Update Security Credentials (Device) the DCC Systems are updated to record which Device Certificates are currently in use by the Device.

When the DCC receives no Response from an Update Security Credentials (Device) the DCC Systems shall initiate a Command using both the old and new Key Agreement Device Certificates to determine which Key Agreement Device Certificates are currently in use by the Device. If the DCC receives a Response to the Command using the new Key Agreement Device Certificate, then the DCC Systems are updated to record which Key Agreement Device Certificates are currently in use by the Device.

■ Legal text amendments – Appendix AD 2/2

3.8.114 Update HAN Device Log

3.8.114.4 Additional DCC System Processing

- a) If the CHF Device Log confirming communications have been established with the Device specified in the Service Request is received within the timeout period, then the DCC Systems shall notify the Responsible Supplier for the specified Device via a DCC Alert N24, and;
 - i. For ESME, GSME, HCALCS and PPMID the Device Status is set to 'InstalledNotCommissioned' in the Smart Metering Inventory; and
 - ii. The DCC Systems shall initiate a Command to the Device using each available Key Agreement Device Certificate to determine which Key Agreement Device Certificate is currently in use by the Device. If the DCC receives a Response to a Command using a particular Key Agreement Device Certificate, then the DCC Systems are updated to record this Key Agreement Device Certificate as currently in use by the Device.

■ MP239: Recommendations

- **AGREE** this Modification Proposal should proceed to vote
- **DETERMINE** whether this Modification Proposal should be **APPROVED** or **REJECTED** under Self-Governance
- **PROVIDE** rationale for this decision against the General SEC Objectives

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

■ MP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'

Mohammedanwar Sumro

Raised by Paul Bedford from Drax
Self-Governance

HIGH

■ MP262: Overview

- Installation End Date has passed for Communications Hubs on CHTS v1.0 and GBCS v1.1 on 31 May 2023
- Approximately 120,000 Communications Hubs on these specifications not yet installed.

Issue



- Any installation of Communication Hubs on CHTS v1.0 and GBCS v1.1 are non-compliant and will not count towards rollout targets.

Impact



- SEC Schedule 11 'Technical Specification Applicability Tables' to have an extension of the Installation End Date for relevant CHTS v1.0 and GBCS v1.1.
- 2 year extension 31 May 2025

Proposed Solution



■ MP262: Key points

Device scrappage

- A large majority of the Communication Hubs can still be upgraded but there is no guarantee of supporting Pre-Payment consumers
- Earlier firmware versions were produced before prepayment was an operational service
- Not possible to upgrade certain Devices – DCC requested to return these Devices

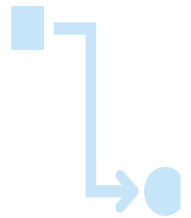
Known issues on certain firmware versions

- Installs can still take place but will not count towards install targets

TABASC input

- Recommend not to extend the TSAT
- Communication Hubs on certain firmware versions that have known defects
- Did not want to officially support TSAT extension when under the knowledge of defected Devices

■ MP262: Assessment of Change



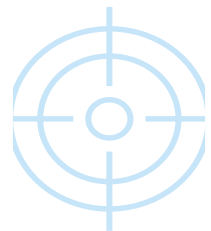
Impacted Parties

- Suppliers
- Meter Installers



Costs

- SECAS implementation costs



Target Release

- Ad-Hoc SEC Release
- 1 Working Day after decision



Benefits

- Allow Suppliers to have installs of CHTS v1.0 and GBCS v1.1 count towards rollout targets

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

OPSG

Requested to have a Supplier raise the modification a TSAT extension is being requested

No comments received from further interactions with OPSG

TABASC

Does not support the modification

Known issues with Device models on earlier firmware versions

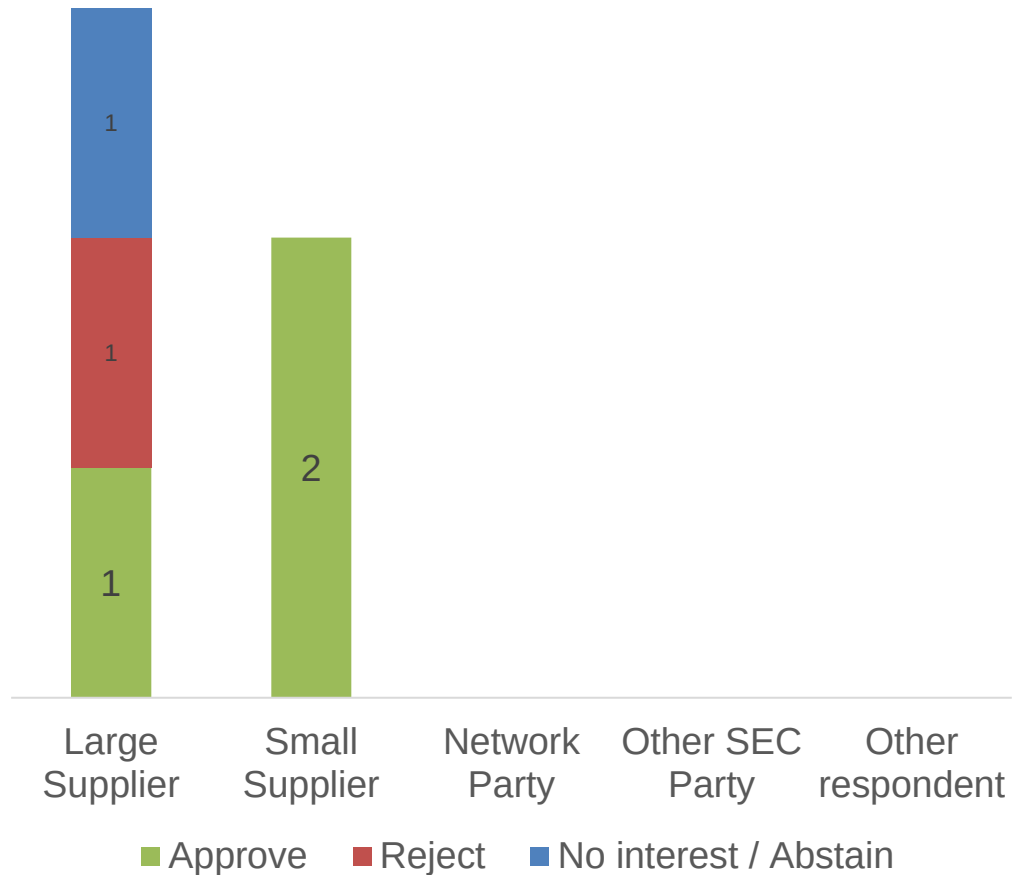
Recommendation to not extend CHTS v1.0 and GBCS v1.1 Installation End Date

SSC

No security impacts by extending the TSAT for CHTS v1.0 and GBCS v1.1

Stated it is not best practice to install due to security characteristics on older Devices.

■ MP262: MRC Responses



Key comments

- Supports General SEC Objective (a)
- This TSAT deadline in question has already been extended once
- Previous TSAT extension of 3 months was too short
- Suppliers can't return large amounts of Communication Hubs currently
- Majority of stock can require a single firmware update
- The TSAT exists to ensure that installations have the best chance of a secure, operable customer experience

■ MP262: Recommendations

- **DETERMINE** whether this Modification Proposal should proceed to vote
- **DETERMINE** whether this Modification Proposal should be **APPROVED** or **REJECTED** under Self-Governance
- **PROVIDE** rationale for this decision against the General SEC Objectives

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

BREAK



PLEASE RETURN IN 10 MINUTES

■ MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

Liz Woods

Raised by Tom Woolley from SMS Plc

Authority Determined

MEDIUM

Overview

- Only Suppliers can deploy and activate firmware.
- RSAs are authorised to maintain the Supplier's meters but unable to maintain Device Firmware.
- Burden of maintaining meter firmware versions solely on Suppliers.

Issue



- Suppliers that use RSAs, leads to inefficiencies in Smart service
- Increased risk of Device firmware becoming outdated & more vulnerable to security breaches.
- Reduced interoperability of Devices.

Impact

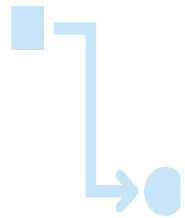


- Allow RSAs to deploy firmware (SRV 11.1 'Update Firmware').
- Suppliers will still need to activate firmware following the deployment.
- No changes to User CIO Assessment.

Proposed Solution



■ Assessment of Change



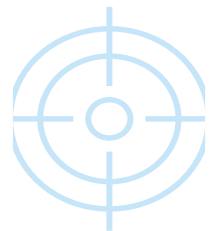
Impacted Parties

- Suppliers
- Other SEC Parties (RSAs)
- DCC



Costs

- As per PA, up to PIT = £151,000 - £350,000
- Estimated full cost = £450,000 - £650,000
- Supplier internal process changes



Target Release

- June 2026 SEC Release



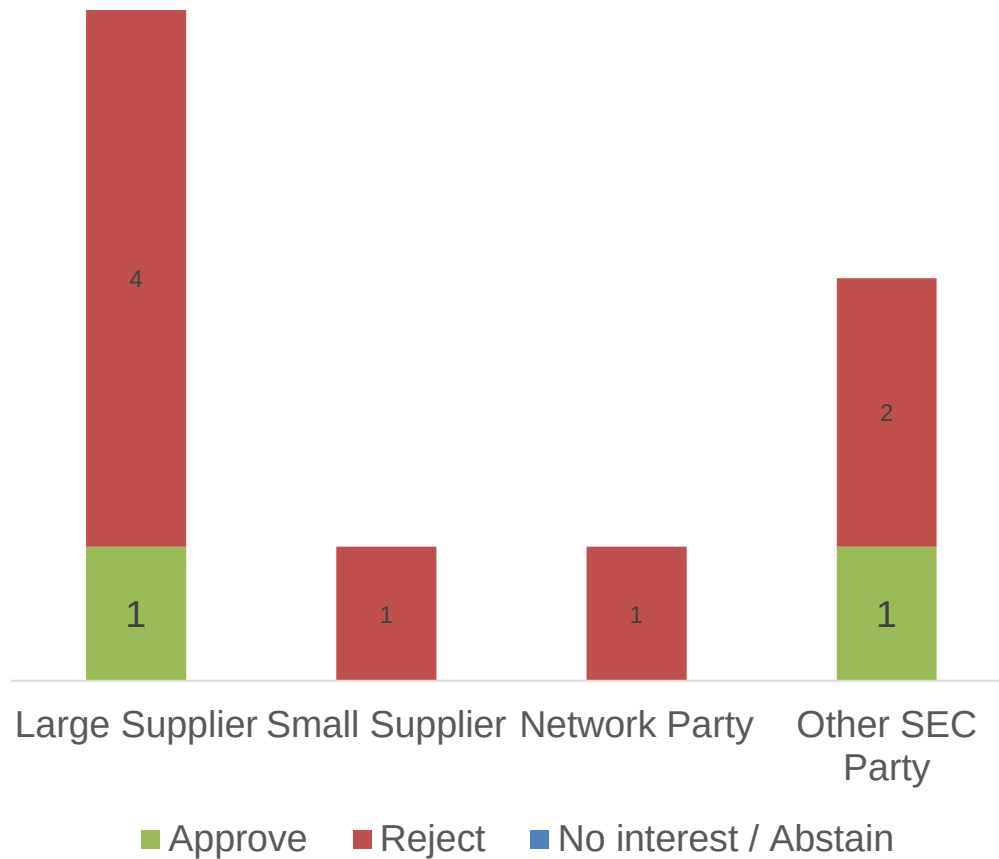
Benefits

- Proposer believes MP207 will assist Suppliers to maintain firmware (only deploy)

SEC Objective (a)

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

MRC Responses



Approve

- Benefits General SEC Objective (a), (c) and (e).
- 'Efficient and timely updating of firmware on metering devices is critical to ensuring the continued operation of these devices and the Smart Metering network as a whole'
- 'Would help ensure that meters continue to receive critical security and feature updates'

Reject

- Solution does not address the issue/resolve problem statement
- Complicate already complex firmware upgrade process
 - Supplier needs to sign firmware distribution request and send to RSA, as within SR11.1 includes Supplier Signature which needs verification by the Device.
- No evidence of support from any of the Industry forums or groups.

■ Working Group comments



Benefits

- 3m Devices not operating in smart mode, which need a firmware update.
- Provides a solution to Suppliers who do not have the resource to do this.
- Meters on unsupported firmware may have been reduced, if the Firmware had been updated historically.

Concerns

- Only a percentage of those 3m Devices are known to not be able to have the firmware upgraded.
- Issue not raised by Supplier.
- Issue with non-communicative Devices is not just about firmware.
- No desire for change demonstrated.
- Issue should be resolved by performance improvement through OPSG.
- Scaled down solution will not resolve the issue.

TABASC

Possibly advantageous for Small Suppliers to have additional support in deploying firmware

Unlikely to provide efficiencies to Supplier with current solution

RSA can already use Supplier's system for firmware maintenance (similar to RSAs with I&C activities)

SSC

No added risk of RSA vs Supplier deploying firmware

No additional User CIO checks if only deploying firmware

Any increased risk is mitigated as activation remains with Supplier

TABASC & SSC are not supportive of RSAs 'activating' firmware

■ MP207: Recommendations

- **AGREE** this Modification Proposal should proceed to vote
- **RECOMMEND** to the Authority whether this Modification Proposal should be **APPROVED** or **REJECTED**
- **PROVIDE** rationale for this recommendation against the General SEC Objectives

SEC Objective (a), (c) and (e)

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
- (c) facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems
- (e) facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy

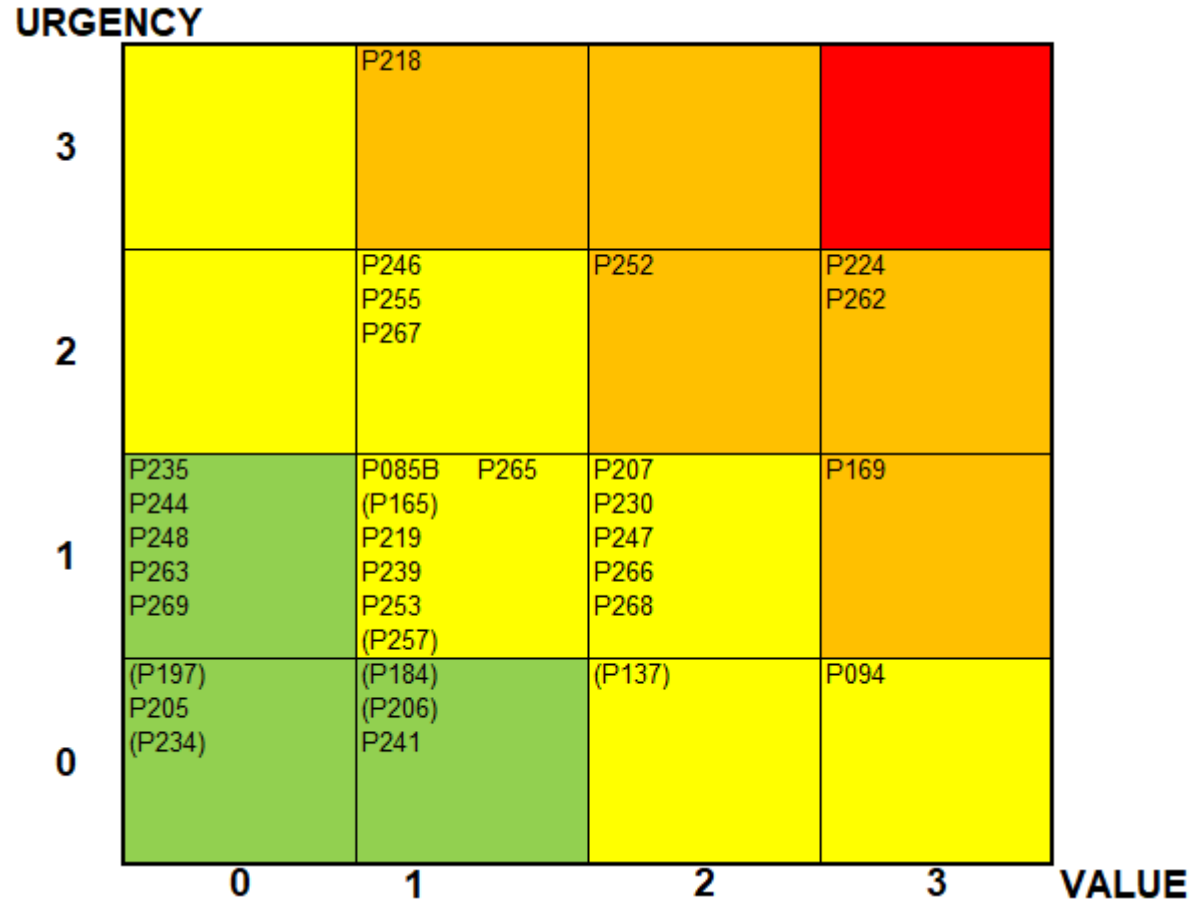
Agenda Item 4

SEC Modifications Timetable
update

■ Monthly summary

- We are working on 33 active modifications.
- There are 7 modifications currently on hold, with none on the waiting list.
- We are examining seven anticipated modifications.
- DP238 and DP258 have been withdrawn since the last meeting.

■ Prioritisation matrix



DP238 and DP258 have been withdrawn.

No new Draft Proposals and no changes to prioritisation scoring.

On hold modifications have circular brackets (), whilst modifications on the waiting list have square brackets [].

■ High and very high priority mods

MP169 'Managing SEC obligations and the Consumers Right to refuse a smart meter'

- Following comments at the June Working Group meeting, SECAS is working with the Proposer, Citizens Advice and Ofgem to determine the proposed applicability of the Restricted Attribute.

DP218 'Review of the SEC Charging Methodology'

- The DCC RFI is open until 25 June. SECAS will hold another ad hoc Working Group once responses have been collated and assessed.

MP252 'Amending the process for Communications Hub returns'

- SECAS are working with the DCC to refine the business requirements before the Preliminary Assessment can be requested.

DCC Assessments

Assessments completed since last meeting

Modification	Assessment type	Accepted	Returned	Total time open
MP239	IA	2 Apr 24	29 May 24	42
MP241	IA	3 Apr 24	6 Jun 24	47

Agenda Item 5

SEC Release Costs Update Del Kang (DCC)

The SEC Release Costs Update slides are classified as 'AMBER', please email sec.change@gemserv.com if you would like to access them.

Agenda Item 6

Any Other Business

■ Annual SEC Party Engagement Day



17 July 2024

10am – 4pm



Each SEC Party can send up to two attendees



**etc. Venues, 8 Fenchurch Place,
London EC3M 4PB**



To express interest: email
secas@gemserv.com by **25 June 2024**
subject line 'SEC Party Engagement Day'



- Meeting SEC Panel members
- Workshops
- Industry expert presentations
- Networking



Invitations and further details will be sent after expressing interest

YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@gemserv.com

Want know more about SEC Change and Modifications?
Why not listen to our Modcasts?!

Available for listen on our [website](#) or [LinkedIn](#)

Thank you for attending

Next meeting:
Wednesday 24 July 2024

SEC OBJECTIVES 1/2

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

SEC Objective (b)

(b) enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence

SEC Objective (c)

(c) Facilitate energy consumers management of their use of electricity and gas through the provision of appropriate information via smart metering systems

SEC Objective (d)

(d) Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy

SEC Objective (e)

(e) Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy

SEC OBJECTIVES 2/2

SEC Objective (f)

(f) Ensure the protection of data and the security of data and systems in the operation of the SEC

SEC Objective (g)

(g) Facilitate the efficient and transparent administration and implementation of the SEC

SEC Objective (h)

(h) Facilitate the establishment and operation of the Alternative Home Area Network (Alt HAN) arrangements